

Kevin H. Sharp

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

JASON GLYNN

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No. 3:13-cr-00059  
CHIEF JUDGE SHARP

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING OF MOTION FOR NEW  
TRIAL PURSUANT TO FED. R. CRIM. P. 33**

Undersigned counsel, William J. Steed III, on behalf of the Defendant, Jason Glynn, respectfully moves this Honorable Court to grant an extension of the deadline for the Defendant to file a Motion for New Trial, pursuant to Fed. R. Crim. P. 33. The defense respectfully seeks an extension to February 1, 2016, approximately 30 days from the current deadline. The defense contacted Assistant United States Attorney Bill Abely, and Mr. Abely advised that the Government does not oppose an extension.

In support of this Motion, undersigned counsel submits the following:<sup>1</sup>

(1) As noted above, the Government does not oppose an extension of the deadline, so this an unopposed request for an extension.

(2) Fed. R. Crim. P. 33(a) governs a defendant's Motion for New Trial, providing that a court may vacate a judgment of conviction and grant a new trial "if the interest of justice so requires". The defense here anticipates filing such a Motion pursuant to Fed. R. Crim. P. 33(b)(2), relying on reasons "other than newly discovered

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<sup>1</sup> Defense counsel has also separately filed an unopposed motion for an extension of time to file a Motion (or renewed Motion) for Judgment of Acquittal, pursuant to Fed. R. Crim. P. 29. See Docket No. 124. The reasons for the instant Motion are substantively the same as the reasons stated in the instant Motion, so there is significant repetition in these filings. Counsel files each Motion separately, so as to avoid waiving either argument, and so as to be clear that counsel is seeking additional time to file each post-trial motion, rather than conflating the two.